

KSC/03.18.24
JO/LNE: USAO 2020R00502

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

KEVIN FULLER,

Defendant.

*
*
*
*
*
*
*
*
*
*
*

CRIMINAL NO. SAG-21-0286

(Conspiracy to Distribute and Possess
with the Intent to Distribute Controlled
Substances, 21 U.S.C. § 846; Forfeiture,
21 U.S.C. § 853).

USDC - BALTIMORE
'24 APR 11 AM 9:42

SUPERSEDING INFORMATION

COUNT ONE

The United States Attorney for the District of Maryland charges that:

From or about April 2020 through November 2021, in the District of Maryland,

KEVIN FULLER,

the defendant herein, did knowingly and willfully combine, conspire, confederate and agree with others known and unknown to distribute and possess with intent to distribute at least 40 grams or more of mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, also known as fentanyl, a Schedule II controlled substance.

21 U.S.C. § 846

FORFEITURE

The United States Attorney for the District of Maryland further alleges that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853 as a result of the defendant's conviction under Count One of the Superseding Information.

Narcotics Forfeiture

2. Upon conviction of the offense alleged in Count One of this Information, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of any such offense, and (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

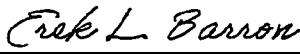
Substitute Assets

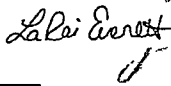
3. If any of the property described above, as a result of any act or omission of any defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above, pursuant to 21 U.S.C. § 853(p).

21 U.S.C. § 853


Erik L. Barron
United States Attorney

 Digitally signed
by LaRai Everett
Date: 2024.03.18
17:30:57 -04'00'

March 18, 2024
Date